

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,
CHRISTOPHER HUGHES, and THEFACEBOOK,
INC.,

Defendants.

MARK ZUCKERBERG, and THEFACEBOOK,
INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

CIVIL ACTION NO. 1:04-CV-11923
(DPW)

**ASSENTED-TO MOTION TO SEAL THE FACEBOOK'S DEFENDANTS'
MEMORANDUM IN SUPPORT OF THE FACEBOOK DEFENDANTS' MOTION TO
COMPEL PARTICULARIZED IDENTIFICATION OF TRADE SECRETS IN
RESPONSE TO THE FACEBOOK DEFENDANTS' INTERROGATORY NO. 2, AND
EXHIBITS 2 AND 7 IN SUPPORT THEREOF**

Defendants Mark Zuckerberg, Dustin Moskovitz, Andrew McCollum, Christopher Hughes, and TheFacebook, Inc.¹ ("The Facebook Defendants") hereby move to file under seal pursuant to the Stipulated Protective Order entered by the Court in this case, the following

¹ Defendant Eduardo Saverin is represented by separate counsel in this matter.

documents, exhibits and attachments:

1. **MEMORANDUM IN SUPPORT OF THE FACEBOOK DEFENDANTS' MOTION TO COMPEL PARTICULARIZED IDENTIFICATION OF TRADE SECRETS IN RESPONSE TO THE FACEBOOK DEFENDANTS' INTERROGATORY NO. 2**
2. **EXHIBITS 2 AND 7 TO THE AFFIDAVIT OF MONTE COOPER IN SUPPORT OF THE FACEBOOK DEFENDANTS' MOTION TO COMPEL PARTICULARIZED IDENTIFICATION OF TRADE SECRETS IN RESPONSE TO THE FACEBOOK DEFENDANTS' INTERROGATORY NO. 2**

This motion is necessary to comply with the provisions of the Stipulated Protective Order.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Counsel for the Facebook Defendants certifies that pursuant to Local Rule 7.1, the parties have conferred regarding the issues presented by this motion, and counsel for the plaintiff ConnectU and Eduardo Saverin (Troy E. Grabow and Daniel Hampton) consent to the motion.

Dated: September 8, 2005.

Respectfully submitted,

/s/ Monte M.F. Cooper

G. Hopkins Guy, III*
I. Neel Chatterjee*
Monte M.F. Cooper*
Joshua H. Walker*
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025
Telephone: (650) 614-7400
Facsimile: (650) 614-7401
hopguy@orrick.com
nchatterjee@orrick.com
mcooper@orrick.com
jwalker@orrick.com

Steve M. Bauer
Jeremy P. Oczek
PROSKAUER ROSE, LLP
One International Plaza, 14th Floor
Boston, MA 02110-2600
Telephone: (617) 526-9600
Facsimile: (617) 526-9899
sbauer@proskauer.com
joczek@proskauer.com

ATTORNEYS FOR MARK ZUCKERBERG,
DUSTIN MOSKOVITZ, ANDREW
MCCOLLUM, CHRISTOPHER HUGHES, and
THEFACEBOOK, INC.

* Admitted Pro Hac Vice